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POSTAL REGULATORY
COMMISSION

September 13, 2017

Chairman Robert G. Taub Postal Regulatory Commission 901 New York Avenue NW, Suite 200 Washington, DC 20268

RE: Docket No. RM2017-12

Dear Chairman Taub:

Consumer Reports (CR) urges the Commission to disapprove the proposal of the United States Postal Service (USPS) to redefine how the 60 percent ratio between nonprofit and commercial Marketing Mail rates is computed. This adjustment would significantly raise rates for regular nonprofit Marketing Mail by 3.3 percent and Enhanced Carrier Route Nonprofit Marketing Mail by 6.9 percent. This would be in addition to the 2 percent CPI-based increase already planned for January 2018.

For more than eight decades CR has been an independent, nonprofit organization that works side by side with consumers to create a fairer, safer and healthier world. CR's testing and reporting over the past year prompted manufacturers to improve their products. As part of the release of this year's auto issue, CR announced it would start deducting points from any vehicle with a confusing shifter design that lacked safeguards against rollaway, given the number of injuries associated with this design. Duro, the maker of NXR ranges, fixed one of its ranges after CR discovered a safety issue with the oven racks. CR has been calling on manufacturers to make liquid laundry detergent pods safer since they were first introduced in 2012, and was instrumental in getting the industry to agree to packaging changes a few years ago, but will not recommend any laundry detergent packets until we see a meaningful decline in calls to poison control centers.

CR is funded primarily by subscriptions and donations. For every penny increase in the postal rate, CR's mail costs jump by more than \$1,000,000. As we have experienced in the last few years, increased postage costs will force us to curtail the volume of mail we send. Reduced subscriber acquisition and fundraising mail means reduced revenue, and fewer resources to spend on testing consumer products.

Please reject efforts to increase postal rates for nonprofit mailers. The current system for calculating the percentage of nonprofit marketing mail, in place since 2008, works.

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Thank you for your consideration.

Sincerely yours,

Meta A. Brophy

Director, Procurement Operations

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